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Date: September 11, 2025

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Via ECF

The Honorable Judge Ann Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza
East Brooklyn, NY 11201

**Re: Baker-Pacius, et al. v. The Dep't of Education of the City of New York, et al.
No.: 1:25-cv-00743-AMD-JAM**

Second Request for Extension of Time To Respond To the Motion To Dismiss

Dear Honorable Judge Donnelly:

We, the Plaintiffs in the above-referenced matter, respectfully request a second extension of time from submission of our Opposition to the Defendants' Motion To Dismiss on September 16, 2025.

Completing the Joint Status Report, which is due September 18, 2025, and finishing our research on what needs to be written in our Opposition to the Motion To Dismiss are challenges that we want to honor with valid arguments. However, as we have not done this before, we are attempting to present a meaningful Opposition to the Defendants' Motion to this Court, and we require additional time to complete this work.

We request an extension of time to October 15, 2025. We have reached out to Attorney Linnane at her new law firm, according to Joseph B. Reynolds, Asst. Corporation Counsel, our email was forwarded to him by Ms. Linnane, who is no longer with the Law Department, and he confirmed that the Defendants have consented to the extension.

Please grant this urgent, and final request for time to prepare the papers for the City Law Department.

Thank you for your time and consideration.

Respectfully submitted,

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